

October 16, 2023

**By ECF**

The Honorable Katherine Polk Failla  
United States District Court  
for the Southern District of New York  
Thurgood Marshall Courthouse  
40 Foley Square, Room 618  
New York, New York 10007

**MEMO ENDORSED**

Re: *Dinosaur Financial Grp. LLC et al. v. S&P Global, Inc. et al.*, 22 Civ. 1860 (KPF)

**Subject: Filing of Proposed Orders Pursuant to the Scheduling Order**

Dear Judge Failla:

This joint letter is submitted by all parties.

Pursuant to paragraph 6 of the Court's Scheduling Order dated September 14, 2023 (Doc. No. 116), the parties have conferred and reached agreement as to three stipulations and proposed orders: (i) Stipulated Protective Order; (ii) Order Regarding Production of Electronically Stored Information and Paper Documents; and (iii) Stipulated Order Governing the Disclosure and Non-Disclosure of Certain Information Regarding Experts and Consultants.

The parties do not at this time anticipate proposing the entry of a separate Order under Federal Rule of Evidence 502(d), although they respectfully request the Court permit them to request such an Order at a later date should the need arise.

Respectfully Submitted,

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The Honorable Katherine Polk Failla  
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The Court will separately endorse and docket the parties' stipulations and proposed orders. The parties may seek a separate order under Federal Rule of Evidence 502(d) at the time that such a need may arise.

Dated: October 17, 2023  
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE